

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

**v.**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**Civil Action No. 1:17-CV-2989-AT**

**MOTION FOR USE OF ELECTRONIC EQUIPMENT IN THE  
COURTROOM DURING DECEMBER 15 PRETRIAL CONFERENCE**

Plaintiffs Donna Curling, Donna Price and Jeffrey Schoenberg (the “Curling Plaintiffs”) respectfully move for entry of an Order authorizing the use of electronic equipment, including 6 laptop computers with laptop power cords, 2 tablet computers (e.g., Apple iPad, Microsoft Surface Pro), 10 smart phones with smartphone power cords, 2 USB drives, and one personal WiFi hotspot device, by their legal representatives on Friday, December 15, 2023 in conjunction with a pretrial conference scheduled to begin at 10:30 a.m. before Judge Amy Totenberg in Courtroom 2308 of the above-captioned Court.

The Curling Plaintiffs submit that good cause exists to grant this Motion, and request that this authorization for their attending counsel of record, David D. Cross, Mary Kaiser, Ramsey Fisher, Christian Andreu-von Euw, Adam M. Sparks,

Halsey G. Knapp, and Jessica G. Cino, extend through completion of the hearing, at the Court's discretion.

The Curling Plaintiffs additionally request that Donna Price be permitted to bring one smartphone with smartphone power cord to provide necessary personal audio accommodation at the December 15, 2023 pretrial conference.

WHEREFORE the Curling Plaintiffs respectfully request that this Court enter an Order GRANTING this Motion and the relief it requests.

A proposed Order is attached hereto.

Respectfully submitted, this 13th day of December, 2023.

/s/ David D. Cross

David D. Cross (*pro hac vice*)  
Mary G. Kaiser (*pro hac vice*)  
Matthaeus Martino-Weinhardt  
(*pro hac vice*)  
Ramsey Fisher (*pro hac vice*)  
Aaron Scheinman (*pro hac vice*)  
Benjamin Campbell (*pro hac vice*)  
Wail Jihadi (*pro hac vice*)  
Oluwasegun Joseph (*pro hac vice*)  
MORRISON & FOERSTER LLP  
2100 L Street, NW, Suite 900  
Washington, DC 20037  
(202) 887-1500  
dcross@mofo.com

/s/ Halsey G. Knapp, Jr.

Halsey G. Knapp, Jr.  
GA Bar No. 425320  
Adam M. Sparks  
GA Bar No. 341578  
Jessica G. Cino  
GA Bar No. 577837  
KREVOLIN & HORST, LLC  
1201 West Peachtree Street, NW  
Suite 3250  
Atlanta, GA 30309  
(404) 888-9700  
hknapp@khlawfirm.com

/s/ Christian G. Andreu-von Euw

Christian G. Andreu-von Euw

(*pro hac vice*)

THE BUSINESS LITIGATION GROUP, PC

150 Spear Street

San Francisco, CA 94105

(415) 765-6633

christian@blgrp.com

*Counsel for Plaintiffs Donna Curling, Donna Price & Jeffrey Schoenberg*

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross  
David D. Cross

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 13, 2023, a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to all attorneys of record.

/s/ David D. Cross  
David D. Cross

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**ORDER TO ALLOW USE OF ELECTRONIC EQUIPMENT  
IN THE COURTROOM**

IT IS HEREBY ORDERED that counsel of record for the Curling Plaintiffs<sup>1</sup> in the above-referenced case, David D. Cross, Mary Kaiser, Ramsey Fisher, Christian Andreu-von Euw, Adam M. Sparks, Halsey G. Knapp, and Jessica G. Cino, be permitted to bring the following personal electronic devices into the Richard B. Russell Federal Building, Courtroom 2308, on December 15, 2023 for a pretrial conference before Judge Amy Totenberg:

- laptop computers and computer accessories (e.g., computer mouse, battery recharger, personal WiFi hotspots, power cords);
- tablet computers (e.g., Apple iPad, Microsoft Surface Pro); and

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<sup>1</sup> The Curling Plaintiffs are Donna Curling, Donna Price, and Jeffrey Schoenberg.

- apple watch and mobile phones, including mobile phones with cameras  
(which may also operate as WiFi hotspots).

It is further ordered that Donna Price be permitted to bring one smartphone with smartphone power cord. Proper identification will be required upon entering the facility. Said electronic equipment shall be subject to inspection by the facility's law enforcement/security officers.

**IT IS SO ORDERED** this \_\_\_\_th day of \_\_\_\_\_, 2023.

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**AMY TOTENBERG**  
**UNITED STATES COURT JUDGE**